
DECISION MEMO
Pocket Gopher Control – Lochsa-Powell



USDA Forest Service, Northern Region
Lochsa – Powell Ranger District
Nez Perce – Clearwater National Forests
Idaho County, Idaho



I. Decision

I have decided to authorize renewal of the Pocket Gopher Control – Lochsa-Powell project located on the Nez Perce – Clearwater National Forests. See Table and Maps below for treatment locations.

Background: Damage to conifer seedlings by pocket gophers is a major factor limiting reforestation success in the western United States. Pocket gophers can seriously affect conifer regeneration up to 10 years after planting. The most serious damage, however, occurs within the first, second or third years of tree growth. Regeneration surveys have determined that stocking levels can be reduced by as much as 50 to 75 percent in stands with high levels of pocket gopher activity.

Gophers commonly injure seedlings by pruning the roots and by girdling or clipping the stems. When stems are 0.5 inches or less in size, gophers may pull planted seedlings into their tunnels from below, leaving little evidence of the tree's existence above ground. Root pruning in plantations may go unnoticed until the tops turn brown from summer drought or until normal appearing seedlings tip over at odd angles.

Narrative Summary: Experience and research have shown that below ground hand baiting is the safest, most effective, and practical means of controlling pocket gopher populations in the forest environment. Strychnine does not accumulate in living organisms and it breaks down rapidly in the environment, where it is subject to decomposition by microorganisms into non-toxic chemical elements. Research suggests a half-life for the strychnine in the bait of from two weeks to one month. Strychnine treated bait begins to mold within 10 to 14 days under average soil moisture conditions; after that time period, the bait becomes unpalatable to rodents.

Project Design Specifications/Equipment: The project treats approximately 109 acres (4 stands; see Table below) for pocket gopher population suppression. Treatment will occur when soil conditions are still moist but not saturated. Treatments will be suspended when soils were wet or heavy rain is predicted. Treatments will not occur within INFISH/PACFISH RHCA buffers of 50 to 300 feet.

The EPA approved rodenticide for treating pocket gophers below ground is 0.5% strychnine alkaloid treated steam-rolled oats (EPA Registration Number 56228-20). One teaspoon of the oat bait will be deposited below ground directly into the gophers' burrows through a hole in the top of the burrow using a steel probe. After the bait is deposited, the hole is immediately covered up. Application rates of 1/8th to one pound of bait per acre is typically adequate but may be increased up to two pounds per acre in heavily infested stands.

Table: Stands to be treated for Pocket Gopher Control on the Lochsa-Powell Ranger District

Township	Range	Section	Activity Unit, Forest, District & Stand No.	Acres	Currently Planted?	County
33N	6E	23, 25, 26	50520090251	38	Yes	Idaho
33N	6E	25, 36	50520090252	39	Yes	Idaho
33N	7E	9	505A200100138	5	No	Idaho
33N	7E	9	505A120900060	27	No	Idaho
Total acres				109		

Treatments will be done by contract and the contractor must be licensed by the State of Idaho as a professional pesticide applicator. Most contractors can treat between 50 – 100 acres per day depending on unit size and the amount of pocket gopher activity.

The bait will be kept in a well-marked locked container while not in use. Bait dispensers will be covered to prevent spillage. No bait will be stored within 200 feet of any water source. Transferring bait to dispensing containers will be done over plastic sheets or within a self-contained bait storage bin.

The Forest has 20 + years of experience using the above pocket gopher treatment method to reduce seedling mortality and achieve reforestation objectives. Similar success is expected with the current treatments proposed for this project.

Design Criteria

- Favor pesticides with half-lives of three months or less when practicable to achieve treatment objectives.
- Apply at lowest effective rates as large droplets or pellets.
- Follow the label directions.
- Favor selective treatment.

Project Implementation: Treatments would be implemented between June 15th through July 31st, beginning in 2017 and extending to 2022. The stands will be treated for approximately two years during this timeframe

II. Rationale for Decision and Reasons for Categorically Excluding the Decision

A. Category of Exclusion and Rationale for Using the Category

Based on information in this document and the project record, I have determined that no extraordinary circumstances affecting resource conditions exist (36 CFR 220.6), that this project may be categorically excluded from documentation in an EA or EIS, and that it meets all the criteria outlined for 36 CFR 220.6(e)(6): *Timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than 1 mile of low standard road construction*

The rationale for my decision is based on: 1) the proposed action fully meeting the criteria for Categorical Exclusions; 2) the proposed action meeting the purpose and need; 3) the findings related to extraordinary circumstances, discussed below; 4) the project's consistency with laws and regulations, including the

Forest Plan; 5) the on-the-ground review and discussion with district resource specialists; and, 6) my review of the Biological Assessments (BA), Biological Evaluations (BE), and specialists' reports.

B. Finding No Extraordinary Circumstances

Based on the findings for resource conditions described below, I have determined that no extraordinary circumstances are associated with my decision. Forest Service direction at 36 CFR 220.6(b) describes the resource conditions that should be considered in determining whether extraordinary circumstance related to the proposed action warrant further analysis and documentation in an EIS or EA.

Additionally, 36 CFR 220.6(b) states "The mere presence of one of more of these resource conditions does not preclude use of a categorical exclusion. It is the existence of a cause-effect relationship between a proposed action and the potential effect on these resource conditions and if such a relationship exists, the degree of the potential effect of a proposed action on these resource conditions that determines whether extraordinary circumstances exist."

1. Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat or Forest Service sensitive species.

The Interdisciplinary Team (IDT) Botanist has determined the proposed action will have "no effect" to species listed as federally threatened or endangered or their habitats. *Dasynotus* (*Dasynotus daubenmirei*), an R1 sensitive species, is known to occur in the proposed treatment area. While individual plants may be impacted by the proposed activities, the species' overall viability would not.

The IDT Wildlife Biologist determined the proposed action will have "no effect" to Canada lynx and "no jeopardy" to North American wolverine or their habitats: the project area is outside any LAU, does not impact lynx habitat and there is no wolverine habitat associated with the project.

A "may adversely impact individuals or habitat" determination was made for flammulated owl, fisher, gray wolf and Western (boreal) toad. Habitats for the species would not be impacted; however, the proposed activity could cause individuals to temporarily avoid the project area during implementation. Wolves and fisher could potentially feed on gopher carcasses. However, studies have found no indications of secondary poisoning of wolves or fisher resulting from below ground baiting. Gopher burrows provide refugia for western toads (Stinson 2005), therefore the project could impact individual western toads and their habitat. Overall, the effects would be minor and of short duration and would not result in a loss of viability, nor cause a trend towards federal listing or a loss of species viability range wide.

The IDT Fish Biologist determined the proposed action would have "no effect" on federally threatened species because the species and designated critical habitat do not occur within the project area. The biologist also determined the proposed action would have "no impact" on R1 Sensitive species or their habitats since the species do not occur within the project area.

Based on the above assessment, no effects exist that will cause an incremental cumulative effect and no extraordinary circumstances were identified for these resources. For the complete analyses, see the Fishery, Wildlife and Botany Biological Assessments and Evaluations and specialists' reports in the project record.

2. Floodplains, wetlands or municipal watersheds.

There are no floodplains, wetlands or municipal watersheds within the project area. No measureable direct or indirect significant, adverse effects to water resources are expected from project implementation. Based on the above analysis, no extraordinary circumstances were identified.

3. Congressionally designated areas, such as wilderness, wilderness study areas or national recreation areas.

The project area is not located within congressionally designated wilderness areas, wilderness study areas or Wild and Scenic River corridors; therefore, no extraordinary circumstances were identified.

4. Inventoried Roadless areas or potential wilderness areas.

The project is not located within any Clearwater Forest Plan Roadless areas or Idaho Roadless areas (36 CFR 294(c)) or potential wilderness areas; therefore, no extraordinary circumstances were identified.

5. Research Natural Areas.

The project area does not include land designated as a Research Natural Area; therefore, no extraordinary circumstances were identified.

6. American Indians and Alaska native religious or cultural sites.

The Forest Cultural Resource Specialist determined the project has little likelihood to adversely affect cultural properties, assuming such properties were present. Therefore, no extraordinary circumstances were identified to native religious or cultural sites.

7. Archaeological sites or historical properties or areas.

The Idaho State Historic Preservation Officer, or the Forest Archaeologist via the use of the North Idaho Programmatic Agreement, has determined that no archaeological or historic property will be adversely affected by this project. Therefore, no extraordinary circumstances were identified to these resources.

III. Interested and Affected Agencies, Organizations, and Persons Contacted

On March 27, 2017, letters providing information and seeking public comment were mailed to individuals, organizations, state and local agencies, and the Nez Perce Tribe. Project information was made available at <http://www.fs.usda.gov/nezperceclearwater/landmanagement/projects>. A legal notice appeared in the *Lewiston Tribune* on March 27, 2017, inviting comments for 30 days from publication. Two comments specific to the project were received during the scoping period. Responses to the comments can be found in Appendix A. The original letters are available in the project record.

IV. Findings Required by Other Laws

Based on my review of the action associated with this project, I find that it is consistent with applicable Federal laws and regulations.

National Forest Management Act and Clearwater National Forest Plan: This action is consistent with the Clearwater National Forest Plan (USDA Forest Service 1987b), as amended, as required by the National Forest Management Act of 1976 because it follows the standards and guidelines contained in those plans. In addition, the decision considers the best available science (36 CFR 219.35(a); Reinstatement of the 2000 Planning Rule; 74 FR 242).

PACFISH Riparian Habitat Conservation Areas (RHCAs): All activities associated with the proposed action comply with direction regarding PACFISH because no effects to wildlife or fish species or habitat are anticipated, and minimal soil disturbance will occur.

Endangered Species Act: A Forest Service Fish Biologist, Wildlife Biologist, and Botanist evaluated the proposed action with regard to the Endangered Species Act as documented in the Biological Assessments, Biological Evaluations, and specialists' reports, and determined the project is consistent with the Endangered Species Act because no effects to threatened and endangered species are anticipated.

Clean Air Act: This project will comply with the provisions of the Clean Air Act, and the rules, regulations, and permit procedures of the Environmental Protection Agency (EPA) and the Idaho Department of Environmental Quality (IDEQ) because no effects to air quality are anticipated and no prescribed burning is planned.

Clean Water Act and State Water Quality Laws: The Interdisciplinary Team Hydrologist has determined that this project complies with the Clean Water Act, and state and Federal water quality laws because it will have no significant effect to the water quality of area or downstream waters.

National Historic Preservation Act: Because of the type of project and its location, the Forest Cultural Resource Specialist has determined that it has little likelihood to adversely affect cultural properties; therefore, the project meets the Agency's responsibilities under the National Historic Preservation Act (16 USC 470), as amended, and is consistent with the *Programmatic Agreement between the Idaho State Historic Preservation Officer, the Advisory Council on Historic Preservation and the Region 1 National Forests in Northern Idaho Regarding the Management of Cultural Resources*.

Migratory Bird Treaty Act: No substantial losses of migratory bird habitat are expected from the implementation of this project nor any measurable impact on neotropical migratory bird populations as a whole; therefore, the proposed action complies with the Migratory Bird Treaty Act.

The project complies with the U.S. Fish and Wildlife Service Director's Order #131 related to the applicability of the Migratory Bird Treaty Act to Federal agencies and requirements for permits for "take." In addition, the project complies with Executive Order 13186 because the analysis meets Agency obligations as defined under the January 16, 2001 Memorandum of Understanding between the Forest Service and U.S. Fish and Wildlife Service designed to complement Executive Order 13186.

American Indian Treaty Rights: The Nez Perce Tribe has had the opportunity to review the project for impacts to Nez Perce Tribe Treaty rights or Nez Perce Tribal members' abilities to exercise those rights. The Nez Perce Tribe did not identify any concerns.

Environmental Justice: The proposed action will not disproportionately impact consumers, Native American Indians, women, low-income populations, other minorities, or civil rights of any American Citizen in accordance with Executive Order 12898. No disproportionate impacts to minority or low-income populations were identified during scoping or the effects analysis.

Prime Farm Land, Range Land, and Forest Land: The proposed action complies with the Federal Regulations for prime land. The definition of "prime" forest land does not apply to lands within the National Forest System. The project area does not contain any prime range land or farm land. Federal lands will be managed with appropriate sensitivity to the effects on adjacent lands.

Energy Requirements: No unusual energy demands are required to implement the proposed action.

Other Laws or Requirements: The proposed action is consistent with all other Federal, state or local laws or requirements for the protection of the environment and cultural resources.

V. Contact Person

Questions regarding this decision should be sent to Jeff Chynoweth, Small NEPA Team Coordinator, c/o Nez Perce Supervisor's Office, 903 Third Street, Kamiah, Idaho 83536; by telephone to (208) 935-4260 or by FAX at (208) 983-4275 during business hours (M-F, excluding Federal holidays, 7:30 a.m. to 4:30 p.m., PST).

VI. Signature of Deciding Officer



Brandon Knapton
District Ranger
Lochsa – Powell Ranger District

5/18/2017

Date

Enclosures (2): Maps

cc: Clare Brick

**Pocket Gopher Control
Lochsa-Powell Ranger District**



Map 2 of Pocket Gopher Control – Lochsa-Powell Project

